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*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA  
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA, and  
BRUCE MAPLEY SR.,

Defendants,

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
Cross Claimant,

BRUCE MAPLEY, SR.,  
Cross Defendant.

Case No. CV-20-52-BLG-SPW

**PLAINTIFFS' UNOPPOSED  
MOTION TO CONTINUE  
CERTAIN SCHEDULING  
ORDER DEADLINES**

Plaintiffs, by and through their undersigned counsel, and with the agreement of counsel for defendants Watchtower Bible and Tract Society of New York, Inc., and Watch Tower Bible and Tract Society of Pennsylvania, hereby move the Court to continue certain pre-trial deadlines in the December 20, 2021, Scheduling Order (ECF Doc. 105) by three (3) months. The parties anticipate needing additional time to complete discovery and the current Scheduling Order appears to include sufficient time prior to the Motions deadline to accommodate the extensions sought herein. Plaintiffs therefore propose amending certain pretrial deadlines as set forth below:

<b>Deadline</b>	<b>Date</b>
Simultaneous Disclosures of Plaintiffs' Damages and Liability Experts	<b>November 15, 2022</b> (currently Aug. 15, 2022)
Disclosure of Defendants' Damages Experts	<b>December 12, 2022</b> (currently Sept. 12, 2022)
Discovery Deadline	<b>January 31, 2023</b> (currently Oct. 31, 2022)
Fully Briefed Motions Deadline	<b>April 28, 2023</b> (currently Jan. 30, 2023)

No other deadlines in the December 20, 2021 Scheduling Order would be affected by this Motion.

Based upon the foregoing, Plaintiffs respectfully request that the Court amend the December 20, 2021 Scheduling Order as proposed herein to permit the parties additional time to complete discovery. A proposed Order is attached hereto and will be emailed to the Court pursuant to L.R. 7.1.

DATED this 3<sup>rd</sup> day of May, 2022.

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*